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1 2 3 4 5 6 7 8 9	LARRY E. KLAYMAN (D.C. BAR No. 334581) KLAYMAN LAW GROUP, PA 2020 Pennsylvania Avenue NW, Suite 800 Washington, DC 20006 Telephone: 561.558.5536 Email: leklayman@gmail.com Pro Hac Vice MICHAEL D. KOLODZI (CAL. BAR No. 255772) THE KOLODZI LAW FIRM 433 North Camden Drive, Suite 600 Beverly Hills, California 90210 Telephone: 310.279.5212 Facsimile: 866.571.6094 Email: mdk@mdklawfirm.com	
11	KIARA ROBLES	
12	IN THE UNITED STAT	ES DISTRICT COURT
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15	KIARA ROBLES,	Case No.: 4:17-cv-04864
	Plaintiff,	
16	V.	STIPULATION AND [PROPOSED]
17	IN THE NAME OF HUMANITY, WE REFUSE TO ACCEPT A FASCIST AMERICA (a.k.a.	SCHEDULE FOR DEFENDANTS JANET
18	ANTIFA), et al.	NAPOLITANO, NICHOLAS DIRKS, AND THE REGENTS OF THE UNIVERSITY
19 20	Defendants.	OF CALIFORNIA'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT
21		
21		Date: September 4, 2018 Time: 2:30 p.m.
		Judge: Hon. Claudia Wilken
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1 Whereas, Plaintiff Kiara Robles filed an Amended Complaint in this action on June 25, 2 2018; 3 Whereas, Defendants Janet Napolitano, Nicholas Dirks, and The Regents of the 4 University of California ("UC Defendants"), timely filed a motion to dismiss the First Amended 5 Complaint on July 9, 2018; 6 Whereas, Plaintiff's opposition to the motion to dismiss currently is due on July 23, 2018 7 and the UC Defendants' reply is due seven days after filing of the opposition; 8 Whereas, Plaintiff and the UC Defendants by and through undersigned counsel, have 9 conferred and agreed to request additional time to submit their respective opposition and reply 10 papers in light of the schedules of counsel. Now, therefore, Plaintiff and the UC Defendants stipulate pursuant to Local Civil Rule 6-11 12 2 and respectfully request that the Court extend the remaining briefing schedule on Defendants 13 Motion to Dismiss Plaintiff's First Amended Complaint such that Plaintiff's opposition is due on August 6, 2018 (rather than July 23) and the UC Defendants' reply is due on August 20, 2018 14 15 (two weeks after the opposition, rather than one week). There have been no requests to alter the briefing schedule on this motion. The Court has previously granted multiple 16 17 requests to continue the Initial Case Management Conference and a request by Plaintiff to continue his time to oppose Defendant City of Berkeley's motion to dismiss the original 18 19 complaint. Plaintiff and Defendant Ian Dabney Miller have previously stipulated to extend 20 Miller's time to respond to the original complaint. The proposed change to the briefing 21 schedule here should not impact the scheduled hearing date on the UC Defendants' motion, 22 which is currently set for September 4, 2018, or any other dates in the matter. 23 24 DATED: July 23, 2018 Respectfully submitted, 25 Larry Klayman, Esq. Freedom Watch, Inc. 26 2020 Pennsylvania Ave N.W. #345 Washington, D.C. 20006

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Tel: (561) 558-5336 Attorneys for Plaintiff

KIARA ROBLES

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1 2 3 4 5 6 7 8 9	LARRY E. KLAYMAN (D.C. BAR NO. 334581) KLAYMAN LAW GROUP, PA 2020 Pennsylvania Avenue NW, Suite 800 Washington, DC 20006 Telephone: 561.558.5536 Email: leklayman@gmail.com Pro Hac Vice MICHAEL D. KOLODZI (CAL. BAR NO. 255772) THE KOLODZI LAW FIRM 433 North Camden Drive, Suite 600 Beverly Hills, California 90210 Telephone: 310.279.5212 Facsimile: 866.571.6094 Email: mdk@mdklawfirm.com		
11	KIARA ROBLES		
12	IN THE UNITED STATES DISTRICT COURT		
13	FOR THE NORTHERN D	ISTRICT OF CALIFORNIA	
14 15	KIARA ROBLES, Plaintiff,	Case No.: 4:17-cv-04864	
16	V.	[PROPOSED] ORDER GRANTING	
17 18	THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, BERKELEY, et al.	STIPULATION TO EXTEND BRIEFING SCHEDULE FOR DEFENDANTS JANET NAPOLITANO, NICHOLAS DIRKS, AND	
19	Defendants.	THE REGENTS OF THE UNIVERSITY OF CALIFORNIA'S MOTION TO	
20		DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT	
21		Date: September 4, 2018	
22		Time: 2:30 p.m. Judge: Hon. Claudia Wilken	
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1	[PROPOSED] ORDER		
2	Pursuant to stipulation, and for good cause shown, Plaintiff's deadline to respond to Defendants		
3	The Regents of the University of California, Nicholas Dirks, and Janet Napolitano's Motion to		
4	Dismiss is extended to August 6, 2018. Defendant's deadline to file a reply is extended to		
5	August 20, 2018. IT IS SO ORDERED.		
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7	Dated:		
8	Hon. Claudia Wilken		
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